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7                   UNITED STATES DISTRICT COURT  
8                   WESTERN DISTRICT OF WASHINGTON  
9                   AT SEATTLE

10                  GABRIEL NAVARRO, Individually and on  
11                  Behalf of All Others Similarly Situated,

12                  Plaintiff,

13                  v.

14                  REALPAGE, INC.; GREYSTAR REAL  
15                  ESTATE PARTNERS, LLC; CUSHMAN &  
16                  WAKEFIELD, INC.; PINNACLE PROPERTY  
17                  MANAGEMENT SERVICES, LLC; BH  
18                  MANAGEMENT SERVICES, LLC; CAMPUS  
19                  ADVANTAGE, INC.; CARDINAL GROUP  
20                  HOLDINGS LLC; CA VENTURES GLOBAL  
21                  SERVICES, LLC; D.P. PREISS COMPANY,  
22                  INC.; THE MICHAELS ORGANIZATION,  
23                  LLC and INTERSTATE REALTY  
24                  MANAGEMENT COMPANY,

25                  Defendants.

26                  No. 2:22-cv-01552-RSL

27                  STIPULATED MOTION AND  
28                  ORDER SUSPENDING  
29                  DEADLINE FOR CERTAIN  
30                  DEFENDANTS TO RESPOND TO  
31                  COMPLAINT

1 Pursuant to Local Civil Rules 7(d)(1), 7(j), and 10(g), Plaintiff Gabriel Navarro  
2 (“Plaintiff”) and Defendants CA Ventures Global Services, LLC, D.P. Preiss Company, Inc.,  
3 The Michaels Organization, LLC, and Interstate Realty Management Company, (collectively,  
4 the “Stipulating Defendants”), by and through their respective counsel,<sup>1</sup> hereby stipulate as  
5 follows:

6 WHEREAS, Plaintiff filed a Class Action Complaint (the “Complaint”) on November  
7 2, 2022. ECF No. 1.

8 WHEREAS, Plaintiff has served the Stipulating Defendants with process on or about  
9 November 9 and 10, 2022.

10 WHEREAS, the Complaint in this matter asserts claims under Section 1 of the Sherman  
11 Act based on the alleged use of RealPage, Inc.’s software for the student leasing market.

12 WHEREAS, Plaintiff had previously agreed with Defendants RealPage, Inc., Greystar  
13 Real Estate Partners, LLC, Cushman & Wakefield, Inc., Pinnacle Property Management  
14 Services, LLC, BH Management Services, LLC, Campus Advantage, Inc., and Cardinal Group  
15 Holdings LLC to suspend for a short period of time the deadline for those Defendants to  
16 answer, move to dismiss, or otherwise respond to the Complaint, and had agreed to file a status  
17 report with the Court by December 21, 2022, related to a schedule for the case.

18 WHEREAS, Plaintiff and the Stipulating Defendants have conferred telephonically and  
19 by electronic mail, and have agreed that party and judicial efficiency would be best served by  
20 suspending, for a short period of time, the deadline for the Stipulating Defendants to answer,  
21 move to dismiss, or otherwise respond to the Complaint.

22 WHEREAS, Plaintiff and the Stipulating Defendants have agreed to meet and confer  
23 and file a status report with the Court by December 21, 2022, related to a schedule for the case.  
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26 <sup>1</sup> CA Ventures Global Services, LLC, and D.P. Preiss Company, Inc., are still in the process of retaining local  
27 counsel for this action and have been represented by national counsel listed in the signature block below in  
conferences with Plaintiff’s counsel.

1        WHEREAS, Plaintiff anticipates that Plaintiff will propose a Rule 12 briefing schedule  
2 in the status report for the litigation that Plaintiffs think will efficiently and expeditiously move  
3 the case forward.

4        WHEREAS, in making this stipulation, the Stipulating Defendants do not waive, in this  
5 or any other action, any (i) defenses or arguments for dismissal that may be available under  
6 Fed. R. Civ. P. 12; (ii) affirmative defenses under Fed. R. Civ. P. 8; (iii) other statutory or  
7 common law defenses that may be available; or (iv) right to seek or oppose any reassignment,  
8 transfer, or consolidated alternatives. The Stipulating Defendants expressly reserve their rights  
9 to raise any such defenses (or any other defense) in response to either the Complaint or any  
10 original, amended, or consolidated complaint that may be filed in this or any other action.

11      THEREFORE, Plaintiff and the Stipulating Defendants stipulate and agree to suspend  
12 the deadline for the Stipulating Defendants to answer, move to dismiss, or otherwise respond to  
13 the Complaint and request that the Court enter the subjoined order pursuant to this stipulation.  
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15      STIPULATED to this 30th day of November, 2022.  
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STIPULATED MOTION AND ORDER SUSPENDING DEADLINE FOR CERTAIN DEFENDANTS TO  
RESPOND TO COMPLAINT

No. 2:22-cv-01552-RSL

1        /s/ Steve W. Berman

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3        /s/ Breanna Van Engelen

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STIPULATED MOTION AND ORDER SUSPENDING DEADLINE FOR CERTAIN DEFENDANTS TO

RESPOND TO COMPLAINT

No. 2:22-cv-01552-RSL

## ORDER

THIS MATTER came before the Court on the parties' Stipulated Motion to Suspend the Deadline for certain Defendants to Respond to the Complaint. Now therefore,

**IT IS HEREBY ORDERED THAT:**

The deadline for Defendants CA Ventures Global Services, LLC, D.P. Preiss Company Inc., The Michaels Organization, LLC, and Interstate Realty Management Company, to answer, move to dismiss, or otherwise respond to the Complaint is hereby suspended.

Plaintiff and CA Ventures Global Services, LLC, D.P. Preiss Company Inc., The Michaels Organization, LLC, and Interstate Realty Management Company, shall meet and confer and file a status report with the Court by December 21, 2022.

Dated this 1st day of December, 2022.

Robert S. Lasnik  
Robert S. Lasnik  
United States District Judge

**STIPULATED MOTION AND ORDER SUSPENDING DEADLINE FOR CERTAIN DEFENDANTS TO  
RESPOND TO COMPLAINT**

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